

REMARKS

In the Office action mailed September 14, 2005, the examiner rejects claims 1-16. This reply amends claims 1-16. As such, claims 1-16 are pending and under consideration.

I. Response to § 103 rejections

The examiner appears to reject claims 1-16 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,208,347 ("Migdal") in view of U.S. Patent No. 5,452,238 ("Kramer"). However, it is not clear from the body of the rejection which reference the examiner uses as the primary reference. For example, although the examiner states that the rejection is based primarily on Migdal, lines 3-5 on page 4 seem to argue for modifying Kramer. Additionally, the analysis on pages 4-11 seems to suggest that the examiner is primarily applying Kramer then modifying Kramer in view of Migdal.

To expedite prosecution, the applicant will assume that the rejection is based on Migdal in view of Kramer. However, the applicant respectfully requests the examiner to clarify which reference the examiner relies on primarily. Further, the applicant requests the examiner to correct the body of the rejection so it explains which features the examiner feels Migdal does not teach.

The applicant traverses the rejection for the following reasons.

A. Failure to provide a motivation

The examiner states that one would have modified Migdal in view of Kramer "to yield a sold structure" and cites Kramer, column 3, lines 13-15. As explained in the abstract of Migdal, Migdal already describes "a sold structure" as the term is used in Kramer, column 3, lines 13-15. One of skill would not have been led to add a feature to a system that already possesses that feature. As a result, the applicant submits that the examiner's statement of motivation is improper.

B. Failure to teach all features

Claim 1 recites detecting a redundant attribute and deleting it. More specifically, the claim recites "detecting one or more redundant attributes"; "generating a list of attributes to be deleted"; and "deleting attribute information". None of the prior art, when viewed separately or in combination, teach or suggest this feature.

Regarding Migdal, Migdal is directed to an improved model that combines spatial data with texture data. For example, the section the examiner identifies (col. 22, ll. 60-64) seems to teach combining spatial and texture data to create a new type of coordinate called a "6D coordinate". Nowhere does Migdal describe anything comparable to the feature of claim 1 discussed above. Although Migdal teaches reducing model resolution by removing points, a point is not comparable to the "attribute" of claim 1. Further, the points removed are not "redundant".

Regarding Kramer, Kramer is directed to methods for moving a shape from one position to another (see "example 1" in column 10, which describes moving a brick). The examiner highlights column 4, lines 5-10, which teaches "redundant default constraints". First, these "default constraints" are unrelated to the attributes of claim 1. Second, this portion teaches creating redundancies instead of detecting and deleting them. As such, neither this portion of Kramer or any other portion of Kramer describes the feature missing from Migdal.

As neither Migdal nor Kramer teach detecting and deleting a redundancy, these references do not render claim 1 unpatentable. Claims 14-16 contain a feature similar to the feature of claim 1 discussed above. As such, Migdal in view of Kramer also does not render these claims unpatentable. Claims 2-12 are not unpatentable over Migdal in view of Kramer at least because each of these claims depends upon an allowable base claim.

II. Conclusion

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the examiner is requested to telephone the undersigned to attend to these matters.

Serial No. 09/731,799


If there are any additional fees associated with the filing of this reply, please charge them to Deposit Account No. 19-3935.

Respectfully submitted,

Respectfully submitted,

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